

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA  
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA

CP-02-CR-2821-2012

V.

MATTHEW EBO

JUDGE LAZZARA

CONCISE STATEMENT  
OF ERRORS ON APPEAL

ON BEHALF OF:  
Matthew Ebo

ATTORNEY:  
Diana Stavroulakis, Esq.  
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**CONCISE STATEMENT OF ERRORS ON APPEAL**

AND NOW comes the Matthew Ebo, (Ebo), through his attorney Diana Stavroulakis, Esquire, and submits this *Concise Statement of Errors on Appeal* pursuant to Rule 1925(b) of the Rules of Appellate Procedure:

1. The PCRA Court erred in denying relief where Ebo established his after-discovered evidence claim through Raglin's exculpatory eyewitness testimony.
2. The PCRA Court erred in denying relief by incorrectly concluding that Raglin's testimony was offered solely to impeach Robinson's testimony, when in fact it was being offered as substantive, exculpatory evidence establishing Ebo's innocence.
3. The PCRA Court erred in denying relief because Raglin's testimony is likely to compel a different verdict at a new trial.

Respectfully Submitted,

/s/Diana Stavroulakis  
Diana Stavroulakis, Esq.

**PROOF OF SERVICE**

I, undersigned counsel, do hereby verify that this pleading has been PACFiled and a courtesy copy has been mailed to the following individuals, this 1<sup>st</sup> day of February 2020, as follows:

**Service by First Class U.S.P.S. Mail:**

Hon. Beth A. Lazzara  
Court of Common Pleas  
509 Courthouse  
436 Grant Street  
Pittsburgh, PA 15219

Alicia Searfoss, Assistant District Attorney  
District Attorney's Office  
436 Grant Street  
401 Courthouse  
Pittsburgh, PA 15219

Respectfully Submitted:

/s/Diana Stavroulakis  
Diana Stavroulakis